

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

MICHELE L. RAFFERTY, et al.,	)	CASE NO.: 4:16CV00430
	)	
Plaintiffs,	)	JUDGE: BENITA PEARSON
	)	
vs.	)	<b><u>DEFENDANTS TRUMBULL COUNTY</u></b>
	)	<b><u>SHERIFF ALTIERE AND LT. SHAY'S</u></b>
TRUMBULL COUNTY, OHIO, et al.,	)	<b><u>RESPONSES TO PLAINTIFFS' FIRST</u></b>
	)	<b><u>SET OF INTERROGATORIES</u></b>
Defendants	)	
	)	

Now come Defendants, Trumbull County, Ohio, Thomas L. Altieri, Sheriff (in his official capacity), and Eric Shay, Lieutenant (in his official capacity), by and through counsel, Mazanec, Raskin & Ryder Co., L.P.A., and for their Response to Plaintiffs' First Set of Interrogatories, state as follows:

**Interrogatory No. 1**

State the date on which Charles Drennen was hired as a corrections officer at the Trumbull County Jail.

**Answer:**

July 19, 2010

**Interrogatory No. 2**

State the date on which Charles Drennen's employment at the Trumbull County Jail ended.

**Answer:**

May 15, 2014.

**Interrogatory No. 3**

State the reason(s) why Charles Drennen's employment at the Trumbull County Jail ended.

**Answer:**

He resigned.

**Interrogatory No. 4**

State the name and job title of each person who served as Charles Drennen's direct supervisor during his employment as a corrections officer at the Trumbull County Jail.

**Answer:**

July 2010- August 2011 Eric Shay/John O'Brien  
September 2011 – May 2012 John Buch  
June 2012 – May 2013 John O'Brien  
June 2013 – November 2013 Nichole O'Brien  
December 2014 – May 2014 John Buch

**Interrogatory No. 5**

With regard to each person identified in response to Interrogatory No. 4 above, state the dates during which he or she served as Charles Drennen's direct supervisor.

**Answer:**

Please see response to Interrogatory No. 4.

**Interrogatory No. 6**

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Was Charles Drennen ever disciplined during his employment as a corrections officer at the Trumbull County Jail?

**Answer:**

Yes.

**Interrogatory No. 7**

If the answer to Interrogatory No. 6 above is yes, state each date on which discipline was imposed on Charles Drennen.

**Answer:**

Discipline was imposed on December 31, 2012.

Discipline was proposed on July 16 2013 and accepted by Mr. Drennen on August 1, 2013.

**Interrogatory No. 8**

If the answer to Interrogatory No. 6 above is yes, state the reason for each discipline imposed on Charles Drennen.

**Answer:**

Mr. Drennen was disciplined for abusing sick leave.

**Interrogatory No. 9**

If the answer to Interrogatory No. 6 above is yes, describe the conduct which led to the discipline imposed on Charles Drennen.

**Answer:**

On December 31, 2012 Drennen was warned that he had utilized 4 days of sick leave and would be disciplined if he missed work against.

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He called off work on July 6, 2013.

**Interrogatory No. 10**

If the answer to Interrogatory No. 6 above is yes, state the name(s) of the person(s) who made the decision to take disciplinary action against Charles Drennen.

**Answer:**

Lt. Eric Shay

**Interrogatory No. 11**

If the answer to Interrogatory No. 6 above is yes, state the discipline(s) imposed on Charles Drennen.

**Answer:**

December 31, 2012: Received a written warning  
July 31, 2013: Received a one day suspension

**Interrogatory No. 12.**

Was Charles Drennen ever investigated for any reason during the time he was employed as a correction officer at the Trumbull County Jail?

**Answer:**

Yes.

**Interrogatory No. 13**

If the answer to Interrogatory No. 12 above is yes, state when Charles Drennen was investigated.

**Answer:**

The investigation began on May 5, 2014.

**Interrogatory No. 14**

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If the answer to Interrogatory No. 12 above is yes, state why Charles Drennen was investigated.

**Answer:**

Several female inmates stated that they had been harassed and threatened by Mr. Drennen.

**Interrogatory No. 15**

If the answer to Interrogatory No. 12 above is yes, state the names of all persons who participated in any investigation of Charles Drennen.

**Answer:**

Major Thomas Stewart conducted the investigation.

**Interrogatory No. 16**

During the period from January 1, 2007 to the present, has any female inmate of the Trumbull County Jail alleged that a male corrections officer acted inappropriately toward her?

**Answer:**

Yes.

**Interrogatory No. 17**

If the answer to Interrogatory No. 16 above is yes, state the name of the female inmate who made the complaint.

**Answer:**

**Incident #1**

Jenna Floravit  
Tasha Cooper  
Priscilla Miller

**Incident #2**

Christina Boyle

**Incident #3**

Michelle Pickens

**Incident #4**

Miranda Sprague

**Interrogatory No. 18**

If the answer to Interrogatory No. 16 above is yes, state the name of the corrections officer named in the female inmate's complaint.

**Answer:**

Incident #1

Stephen Macrinos

Incident #2

Anthony Delmont

Incident #3

Anthony Delmont

Incident #4

George Palmer

**Interrogatory No. 19**

If the answer to Interrogatory No. 16 above is yes, state the substance of the complaint.

**Answer:**

Incident #1

Ms. Floravit, Ms. Cooper and Ms. Miller complained that Mr. Macrinos would observe Ms. Floravit while she was showering.

Incident #2

Ms. Boyle complained that Mr. Delmont utilized her inmate file to obtain her cell phone number and send her text messages.

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Incident #3

Ms. Pickens, a former inmate, complained after her release the Mr. Delmont had utilized heroin with her and then raped her.

Incident #4

Ms. Sprague complained that she and Mr. Palmer engaged in oral sex while she was an inmate at the Trumbull County Jail.



**Interrogatory No. 20**

If the answer to Interrogatory No. 16 above is yes, state the manner in which the complaint was resolved.

**Answer:**

**Incident #1**

Mr. Macrinos was given a 15 day suspension and signed a last chance agreement. He subsequently violated his last change agreement and was terminated for matters unrelated to his interactions with female inmates.

**Incident #2**

The Sheriff's Office terminated Mr. Delmont. Mr. Delmont grieved his termination and, pursuant to the collective bargaining agreement, the termination went to arbitration. The arbitrator reinstated his employment.

**Incident #3**

Mr. Delmont resigned.

**Incident #4**

Mr. Palmer's employment was terminated. He was criminally prosecuted and charged with sexual battery. He pled guilty to obstructing official business and public indecency.

Respectfully submitted,  
MAZANEC, RASKIN & RYDER CO., L.P.A.

/s/Cara M. Wright

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and Eric Shay, Lieutenant (in his official capacity)

**CERTIFICATE OF SERVICE**

I hereby certify that on March 10, 2017, a copy of the foregoing Defendant Trumbull County's Responses to Plaintiffs' First Set of Interrogatories was served by depositing same in first-class United States mail, postage prepaid, to the following:

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**DANIEL J. MASON**  
Notary Public, State of Ohio  
My Commission Expires 4 MAR 18